



California Regional Water Quality Control Board San Diego Region



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July 8, 2011

Mr. Robert Skands
EC Manager
Pardee Homes
10880 Wilshire Blvd., Suite 1900
Los Angeles, CA 90024

In reply refer to:

CIWQS Place ID: 9 37C349591: carias

Dear Mr. Skands:

Subject: Amendment to Requirements Issued to Pardee Homes, Issued Pursuant to Water Code Section 13267 on April 14, 2011

On April 14, 2011, the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) issued Notice of Violation (NOV) No. R9-2011-0044 to Pardee Homes for violations of Order No. 2009-0009-DWQ, the Construction General Permit. The San Diego Water Board also issued requirements pursuant to Water Code Section 13267¹. On May 31, 2011, the San Diego Water Board met with Pardee Homes via teleconference to clarify the requirements and discuss expectations. This letter summarizes agreements made during the teleconference and addresses your letter dated June 2, 2011.

1. Risk Level 2 requirements are being implemented at the Units 21-22 portion of the construction site (WDID No. 9 37C349591) at this time. The remainder of the project will implement Risk Level 2 requirements no later than September 2, 2011. An updated Risk Determination Analysis will be entered in the SMARTS database by September 2, 2011.
2. Receiving water quality monitoring at the site is not required.

¹ Water Code section 13267, subdivision (b), allows the Water Boards to conduct investigations and to require technical or monitoring reports from any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste in accordance with the conditions in the section.

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3. Bioassessment monitoring cannot be performed because Gonzalez Canyon Creek, in the vicinity of the construction site, is dry. Instead of bioassessment, Pardee Homes will provide a California Rapid Assessment Method (CRAM) analysis on two areas of Gonzalez Canyon Creek in order to gain information regarding the spatial extent of impacts to the WARM and WILD beneficial uses caused by the illegal discharge occurring on March 21, 2011. A CRAM score will be provided for two assessment areas, one upstream and one downstream of the discharge point identified in Figure 17 of the Facility Inspection Report dated March 21, 2011. The CRAM analysis will be provided to the San Diego Water Board no later than August 5, 2011.

In the subject line of any response, please include the requested "In reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Christina Arias at (858) 627-3931 or carias@waterboards.ca.gov.

Respectfully,



DAVID T. BARKER, P.E.
Supervising Water Resource Control Engineer
Surface Waters Basins Branch

Signed under the authority delegated by the Executive Officer

DTB:esb:cma

Cc via email:

Chris Nichols, Pardee Homes

Erika Horn, KCM Group

SMARTS Entries:

SMARTS Entries:	Tech Staff Info & Use
Place/WDID	9 37C349591
Enf ID	405188, 405262
NPDES No.	CAS000002
Violation ID	844329